## McGlinchey Stafford, PLLC

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Counsel for Automotive Rentals, Inc. and ARI Fleet LT

UNITED STATES BANKRUPTCY COURT SOUTHERN DISTRICT OF NEW YORK

IN RE: : Chapter 11

SEARS HOLDING CORPORATION, et al., : Case No. 18-23538-rdd

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Debtors. (Joint Administration Requested)

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## NOTICE OF APPEARANCE AND DEMAND FOR SERVICE OF PAPERS

PLEASE TAKE NOTICE that McGlinchey Stafford hereby appears in the above-captioned bankruptcy cases ("the "Chapter 11 Cases") as attorneys for Automotive Rentals, Inc. and ARI Fleet LT.

PLEASE TAKE FURTHER NOTICE that pursuant to section 1109(b) of title 11 of the United States Code (the "Bankruptcy Code") and Rules 2002, 9007, and 9010 of the Federal Rules

The Debtors in these chapter

<sup>&</sup>lt;sup>1</sup> The Debtors in these chapter 11 cases, along with the last four digits of each Debtor's federal tax identification number, are as follows: Sears Holdings Corporation (0798); Kmart Holding Corporation (3116); Kmart Operations LLC (6546); Sears Operations LLC (4331); Sears, Roebuck and Co. (0680); ServiceLive Inc. (6774); A&E Factory Service, LLC (6695); A&E Home Delivery, LLC (0205); A&E Lawn & Garden, LLC (5028); A&E Signature Service, LLC (0204); FBA Holdings Inc. (6537); Innovel Solutions, Inc. (7180); Kmart Corporation (9500); MaxServ, Inc. (7626); Private Brands, Ltd. (4022); Sears Development Co. (6028); Sears Holdings Management Corporation (2148); Sears Home & Business Franchises, Inc. (6742); Sears Home Improvement Products, Inc. (8591); Sears Insurance Services, L.L.C. (7182); Sears Procurement Services, Inc. (2859); Sears Protection Company (1250); Sears Protection Company (PR) Inc. (4861); Sears Roebuck Acceptance Corp. (0535); Sears, Roebuck de Puerto Rico, Inc. (3626); SYW Relay LLC (1870); Wally Labs LLC (None); Big Beaver of Florida Development, LLC (None); California Builder Appliances, Inc. (6327); Florida Builder Appliances, Inc. (9133); KBL Holding Inc. (1295); KLC, Inc. (0839); Kmart of Michigan, Inc. (1696); Kmart of Washington LLC (8898); Kmart Stores of Illinois LLC (8897); Kmart Stores of Texas LLC (8915); MyGofer LLC (5531); Sears Brands Business Unit Corporation (4658); Sears Holdings Publishing Company, LLC. (5554); Sears Protection Company (Florida), L.L.C. (4239); SHC Desert Springs, LLC (None); SOE, Inc. (9616); StarWest, LLC (5379); STI Merchandising, Inc. (0188); Troy Coolidge No. 13, LLC (None); BlueLight.com, Inc. (7034); Sears Brands, L.L.C. (4664); Sears Buying Services, Inc. (6533); Kmart.com LLC (9022); and Sears Brands Management Corporation (5365). The location of the Debtors' corporate headquarters is 3333 Beverly Road, Hoffman Estates, Illinois 60179. 2176899.1

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of Bankruptcy Procedure (the "Bankruptcy Rules"), McGlinchey Stafford requests that all notices given or required to be given in this case, and all papers served or required to be served in this case, be given to and served upon McGlinchey Stafford at the office, address and telephone number set forth below, and that McGlinchey Stafford be added to the mailing matrix on file with the Clerk of the Bankruptcy Court as follows:

Brian S. McGrath McGLINCHEY STAFFORD 112 West 34<sup>th</sup> Street, Suite 1515 New York, New York 10120

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PLEASE TAKE FURTHER NOTICE that pursuant to section 1109(b) of the Bankruptcy Code, the foregoing demand includes not only the notices and papers referred to in the Bankruptcy Rules specified above, but also includes, without limitation, all orders and notices of any application, motion, petition, pleading, request, complaint, demand, disclosure statement, operating reports, schedule of assets and liabilities, or plan of reorganization transmitted or conveyed by mail delivery, ECF, telephone, telecopy or otherwise, which affects the above-captioned Debtor, property of such Debtor, or Automotive Rentals, Inc. and ARI Fleet LT.

PLEASE TAKE FURTHER NOTICE that this Notice of Appearance and any subsequent appearance, pleading, claim, or suit is not intended, and shall not be deemed or construed, to be a waiver of any of the rights of Automotive Rentals, Inc. and ARI Fleet LT, including: (i) the right to have final orders in non-core matters entered only after *de novo* review by a higher court; (ii) the right to trial by jury in any proceeding so triable herein or in any case, controversy or proceeding related hereto; (iii) the right to have the reference withdrawn in any matter subject to mandatory or discretionary withdrawal; (iv) Automotive Rentals, Inc.'s and ARI Fleet LT's right to enforce any contractual provision with respect to arbitration, or (v) any other rights, claims, actions, or defenses to

which Automotive Rentals, Inc. and ARI Fleet LT are or may be entitled under agreements, in law, or in equity, all of which rights, claims, actions and defenses expressly are reserved.

Dated: October 17, 2018 MCGLINCHEY STAFFORD, PLLC

By: <u>/s/ Brian S. McGrath</u>

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Counsel to Automotive Rentals, Inc. and ARI Fleet LT